UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

) Chapter 11
In re:)
KAISER ALUMINUM CORP., et al.,) Jointly Administered
	Bankruptcy Case No. 02-10429
Debtors.	(JKF)
)
LAW DEBENTURE TRUST COMPANY OF NEW)
YORK,)
Appellant,	Civil Action No. 06-00088 JJF
)
v.)
KAISER ALUMINUM CORP., et al.,)
THIS DATE OF THE COLUMN))
Appellees.	, -
LIVERPOOL LIMITED PARTNERSHIP,)
LIVERI OOL LIMITED I ARTNERSHII,)
Appellant,)
)
v.) Civil Action No. 06-00160 JJF
ALPART JAMAICA, INC., KAISER JAMAICA)
CORPORATION, KAISER ALUMINA)))
AUSTRALIA CORPORATION, AND KAISER))))
FINANCE CORPORATION)
Appellees.	
ippetiees.	=

CERTIFICATION OF COUNSEL REGARDING JOINT STIPULATION AND AGREED ORDER REGARDING ADMINISTRATIVE CONSOLIDATION OF APPEALS AND REVISED BRIEFING SCHEDULE

I, Francis A. Monaco, Jr., of the law firm of Monzack and Monaco, P.A., co-counsel for Law

Debenture Trust Company of New York (the "LDTC"), hereby certify as follows regarding the Joint Stipulation and Agreed Order Regarding Administrative Consolidation of Appeals and Revised Briefing Schedule (the "Agreed Order") attached hereto as Exhibit "A":

- 1. On or about February 8, 2006, Law Debenture Trust Company of New York commenced a bankruptcy appeal captioned *Law Debenture Trust Company of New York v. Kaiser Aluminum Corp.*, et al., Civil Action No. 06-088 (JJF), which is currently pending before this Court.
- 2. On or about March 9, 2006, Liverpool Limited Partnership commenced a bankruptcy appeal captioned *Liverpool Limited Partnership v. US Bank National Association, as Indenture Trustee*, Civil Action No. 06-00160 (JJF), which also is currently pending before this Court.
- 3. The above-referenced bankruptcy appeals (the "Appeals") concern substantially similar issues such that administrative consolidation would be beneficial to the administration of these cases.
- 4. Counsel for LDTC requests that the Court enter the Agreed Order, attached hereto as Exhibit "A", which has been signed and consented to by LDTC; Liverpool Limited Partnership; the Debtors; Ad Hoc Group of Senior Note Holders; Bear Stearns & Co., Inc.; Citadel Equity Fund Ltd.; Citadel Credit Trading Ltd.; Deutsche Bank Trust Company, National Association, as Successor Trustee for 9-7/8% Notes; J.P. Morgan Trust Company, National Association, Successor to Bank One Trust Company, N.A., as Indenture Trustee; and U.S. Bank National Association, as Indenture Trustee
- 5. The undersigned certifies that in addition to obtaining the consent of the above-referenced parties, the Agreed Order was circulated to counsel for the other parties identified as represented by

CTDOCS/1656888.1 2

counsel on the docket for each of the Appeals.^{1/} Respective counsel for the Official Committee of Unsecured Creditors, Ace Insurance Company, the U.S. Trustee, the Asbestos Claimant's Committee and the Asbestos Futures Representative each have indicated that they either take no position or have no objection to the Agreed Order.

WHEREFORE, counsel for LDTC respectfully requests that the Court enter the Agreed Order attached hereto as Exhibit "A".

Dated: March 30, 2006 MONZACK AND MONACO, PA

> __/s/ Francis A. Monaco, Jr._ Francis A. Monaco, Jr. (#2078) Joseph J. Bodnar (#2512) 1201 N. Orange Street, Suite 400 Wilmington, DE 19801 (302) 656-8162

 $^{^{1/}}$ None of the other parties identified as represented by counsel on the dockets for the Appeals has filed a notice of appearance or any other document in either of the Appeals. Nonetheless, in an abundance of caution, counsel for LDTC has circulated the Agreed Order to them in advance of filing it with the Court. CTDOCS/1656888.1

EXHIBIT "A"

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
in ic.)
KAISER ALUMINUM CORP., et al.,	Jointly Administered
Debtors.	Bankruptcy Case No. 02-10429 (JKF)
LAW DEBENTURE TRUST COMPANY OF NEW YORK,	
Appellant,	Civil Action No. 06-00088 JJF
v.	
KAISER ALUMINUM CORP., et al.,	
Appellees.	
LIVERPOOL LIMITED PARTNERSHIP,	
Appellant,	
v.	Civil Action No. 06-00160 JJF
ALPART JAMAICA, INC., KAISER JAMAICA CORPORATION, KAISER ALUMINA AUSTRALIA CORPORATION, AND KAISER	
FINANCE CORPORATION	
Appellees.)	

JOINT STIPULATION AND AGREED ORDER REGARDING ADMINISTRATIVE **CONSOLIDATION OF APPEALS AND BRIEFING SCHEDULE**

This Joint Stipulation and Agreed Order (the "Order") is made as of March 2006, by and between Law Debenture Trust Company of New York; Liverpool Limited Partnership; the Debtors; Ad Hoc Group of Senior Note Holders; Deutsche Bank Trust Company, National Association, as Successor Trustee for 9-7/8% Notes; J.P. Morgan Trust Company, National Association, Successor to Bank One Trust Company, N.A., as Indenture Trustee; and U.S. Bank National Association, as Indenture Trustee (collectively, the "Parties").

WHEREAS, on or about February 8, 2006, Law Debenture Trust Company of New York commenced a bankruptcy appeal captioned Law Debenture Trust Company of New York v. Kaiser Aluminum Corp., et al., Civil Action No. 06-088 (JJF), which is currently pending before this Court;

WHEREAS, on or about March 9, 2006, Liverpool Limited Partnership commenced a bankruptcy appeal captioned *Liverpool Limited Partnership v. US Bank National Association, as Indenture Trustee*, Civil Action No. 06-00160, which also is currently pending before this Court; and

WHEREAS, the above-mentioned bankruptcy appeals concern substantially similar issues such that administrative consolidation would be beneficial to the administration of these cases.

NOW, THEREFORE, IT IS HEREBY STIPULATED, CONSENTED TO AND AGREED, by and among the undersigned, subject to the approval of the Court, as follows:

- 1. The above-mentioned bankruptcy appeals shall be administratively consolidated and Law Debenture Trust Company of New York v. Kaiser Aluminum Corp., et al., Civil Action No. 06-088 (JJF), shall be the lead case for such purposes.
- 2. The following briefing schedule shall apply in the administratively consolidated cases:

Opening Briefs on appeal shall be filed within thirty (30) days of the entry of this Order by the Court.

Answering Briefs on appeal shall be filed within thirty (30) days of receipt of Opening Briefs.

Reply Briefs on appeal shall be filed within twenty (20) days of receipt of Answering Briefs.

Dated: March 30, 2006

LAW DEBENTURE TRUST COMPANY

OF NEW YORK

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SO ORDERED, this ____ day of March, 2006

UNITED STATES DISTRICT COURT JUDGE

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
KAISER ALUMINUM CORP., et al.,	Jointly Administered
Debtors.	Bankruptcy Case No. 02-10429 (JKF)
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Appellant,	Civil Action No. 06-00088 JJF
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Appellees.	- -
LIVERPOOL LIMITED PARTNERSHIP,)
Appellant,)
v.	Civil Action No. 06-00160 JJF
ALPART JAMAICA, INC., KAISER JAMAICA)
CORPORATION, KAISER ALUMINA)
AUSTRALIA CORPORATION, AND KAISER	,)
FINANCE CORPORATION)
Appellees.) -

CERTIFICATE OF SERVICE

I, Heidi E. Sasso, certify that I am not less than 18 years of age, and that I caused service of the foregoing document to be made on March 30, 2006 upon:

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Under penalty of perjury, I declare that the foregoing is true and correct.

_/s/ Heidi E. SAsso_____

Dated: March 30, 2006 Heidi E. Sasso